

THE HONORABLE JAMAL N WHITEHEAD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

THE 8501 CONDOMINIUMS, a Washington  
non-profit corporation,

Plaintiff,

v.

COMMONWEALTH INSURANCE COMPANY  
OF AMERICA, a Delaware corporation;  
ACCELERANT NATIONAL INSURANCE  
COMPANY, a Delaware corporation; and DOE  
INSURANCE COMPANIES 1-10,

Defendants.

No.: 2:22-cv-01412

**STIPULATED MOTION TO  
CONTINUE THE DISCOVERY  
DEADLINES**

**NOTE ON MOTION CALENDAR:  
OCTOBER 27, 2023**

Plaintiff The 8501 Condominiums (the “Association”) and Defendants Commonwealth Insurance Company of America and Accelerant National Insurance Company (collectively “Defendants”) stipulate to this motion for a brief continuance of the discovery deadlines.

Pursuant to LCR 16(b)(6), a scheduling order may be modified “only for good cause and with the judge’s consent.” Good cause exists here because the parties have: (1) scheduled mediation in this matter for November 1, 2023; and (2) are continuing to work together in good faith to resolve remaining discovery issues. The parties conducted a meet and confer on October 26, 2023. This conference was productive, and the parties expect the issues discussed will

be resolved in the next week. However, the current deadline for discovery motions is October 27, 2023, which would require filing a motion to compel now, despite every expectation that intervention by the Court will be unnecessary. For purposes of judicial economy, the parties propose that the discovery deadlines be briefly continued to avoid using unnecessary judicial resources and incurring additional expenses on behalf of the parties should the remaining discovery issues resolve, as expected. This extension is not made for purposes of delay, but rather to permit the parties additional time in an attempt to resolve this matter amicably without incurring substantial further costs or requiring additional time and resources on behalf of the Court. The parties respectfully request that the Court extend the currently scheduled deadline as set forth below.

A proposed order is included herewith.

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Discovery Motion Deadline	10/27/23	11/13/23
Discovery Deadline	11/30/23	12/15/23

The Parties believe that there is good cause under Federal Rule of Civil Procedure 6(b) and Local Civil Rule 10(g) for a continuance of the discovery deadlines due to the reasons set forth above.

Dated this 27th day of October, 2023.

STEIN, SUDWEEKS & STEIN, PLLC  
*Per 10/27/23 Email Authority*

NICOLL BLACK & FEIG, PLLC

/s/ Cortney M. Feniello

/s/ Melinda R. Drogseth

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*Attorneys for Defendants Accelerant National*

*Attorneys for Plaintiff*

*Insurance Company, f/k/a Commonwealth*

*Insurance Company of America*

**ORDER**

Based on the above Stipulated Motion, IT IS SO ORDERED that the discovery deadlines be extended as follows:

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Discovery Motion Deadline	10/27/23	11/13/23
Discovery Deadline	11/30/23	12/15/23

No other deadlines or events are altered.

IT IS SO ORDERED this 27th day of October, 2023.



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Jamal N. Whitehead  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on the date set forth below, I electronically filed the foregoing document with the Clerk of the Court using the CM/CF system which will send notification of such filing to the following:

***Attorneys for Plaintiff The 8501 Condominiums:***

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I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on October 27, 2023, at Monroe, Washington.

/s/ Melinda R. Drogseth  
Melinda R. Drogseth, WSBA #40711